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**From:** PMclaughMA@aol.com [mailto:PMclaughMA@aol.com]

**Sent:** Friday, November 11, 2005 10:51 AM

**To:** RBENNETT@ci.eureka.ca.gov; afattah@sandiego.gov; bfraser@yubacity.net; brockafellow@sandiego.gov; cmendenhall@esgil.com; dneuman@carlton-engineering.com; dennis.richardson@sanjoseca.gov; sbd@sonic.net; john.wolfram@sanjoseca.gov; jrosaler@sandiego.gov; kelly.gangar@sanjoseca.gov; mwood@ci.davis.ca.us; nnakrani@sandiego.gov; ray.collier@newark.org; rsimpson@sjc.org; THECODEINC@aol.com; sean\_daugherty@longbeach.gov; stevem@sonomacity.org; tohara@ci.pleasanton.ca.us

**Cc:** Najera, Dan

**Subject:** Re: Workgroup 9 Meeting

Rick,

I will try to participate in the conference call; however, the time selected conflicts with the "H" work group meeting that I will be attending in Orange Co.

As I indicated to you before, I have concerns about the ventilation proposal and the M work group recommendations impacting H occupancies. Section 1203.5.1 requires one cfm per minute exhaust at the floor level for B, F, M, and S occupancies where any amount of class I and II liquids are used. I recommend it not be submitted or that it be modified to say:

If flammable or combustible liquids are use, exhaust ventilation shall be in accordance with the International Fire Code.

I understand that this provision is currently in the UBC. I have only seen it enforces in laboratories and similar occupancies. I know of no instance in an "M" occupancy where this is enforced. And, as written, it would apply because small amount of Class I and II liquids are used for maintenance, cleaning, painting, etc.

This would be a significant cost impact with questionable benefit. Furthermore, it is arbitrary to apply the requirement to B, F, M and S, occupancies and not to A, E, I and R where there is a potential life risk. Also, it creates conflicts with the IFC.

The International Fire Code adequately addresses the potential problem in the following manner:

Section 3405.3.7.5.1 requires ventilation of 1 air change when the MAQ is exceeded.

Section 3404.3.7.4 requires 1 air change in liquid storage rooms.

Section 3404.3.8.3 requires .25 air changes in warehouses.

Section 3405 provides numerous controls when liquids are dispensed, used, mixed and handled below MAQ but does not require ventilation.

Section 3404.3.4.4 requires liquids for maintenance and operations of equipment in quantities greater than 10 gallons be in cabinets.

Section 3505.3.5.2 provides limits on quantities in use by occupancy.

Also, this requirement should be in the Mechanical Code, not the Building Code. Conflict between the IMC and IFC should not occur because and the International Mechanical Code provisions all are controlled by the Fire Code Committee. Notice that they all have Fs in front of them. ICC and IAPMO have signed a MOU agreeing to develop a single Mechanical Code by the 2009 edition, so the provisions should eventually be picked up in the California Mechanical Code.

Pat McLaughlin